

JEFFREY GRONICH, ATTORNEY AT LAW, P.C.
Jeffrey Gronich, Esq. (#13136)
1810 E. Sahara Ave. Suite 109
Las Vegas, Nevada 89104
Tel: (702) 430-6896
Fax: (702) 727-3903
jgronich@gronichlaw.com
Attorney for Plaintiff Zachary Lasko

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ZACHARY LASKO an individual;

Plaintiff,

VS.

GET FRESH SALES, INC.; EMPLOYEE(S) /
AGENT(S) DOES 1-10; and ROE
CORPORATIONS 11-20, inclusive

Defendants.

Case No. 2:22-cv-01176-JAD-BNW

**PLAINTIFF'S COUNSEL'S MOTION
TO WITHDRAW AS COUNSEL OF
RECORD**

Jeffrey Gronich of Jeffrey Gronich, Attorney at Law, P.C., as counsel of record for Plaintiff in this matter respectfully moves this Court for an Order permitting him to withdraw as counsel of record in this matter. This Motion is made based upon Nevada Supreme Court Rule (SCR) 46, Local Rule of Practice IA 11-6, Nevada Rule of Professional Conduct (NRPC) 1.16, the following Memorandum of Points and Authorities, and the attached declarations.

Dated this 13th day of October, 2022.

Respectfully submitted,

By: /s/ Jeffrey Gronich
Jeffrey Gronich, Esq.
Jeffrey Gronich, Attorney at Law, P.C.
1810 E. Sahara Ave, Suite 109
Las Vegas, NV 89104
Tel (702) 430-6896
Fax (702) 369-1290
Attorney for Plaintiff

1
2 **MEMORANDUM OF POINTS AND AUTHORITIES**
3

4 **I. Withdrawal Is Permitted Under The Circumstances**
5

6 Local Rule of Practice IA 11-6 permits an attorney to withdraw by Motion and order of the
7 court. Similarly, NRPC 1.16(b) permits an attorney to withdraw from representation of a client
8 under the following conditions:
9

- 10 (1) Withdrawal can be accomplished without material adverse effect on the interests of
11 the client;
12 (2) The client persists in a course of action involving the lawyer's services that the lawyer
13 reasonably believes is criminal or fraudulent;
14 (3) The client has used the lawyer's services to perpetrate a crime or fraud;
15 (4) A client insists upon taking action that the lawyer considers repugnant or with which
16 the lawyer has fundamental disagreement;
17 (5) The client fails substantially to fulfill an obligation to the lawyer regarding the
18 lawyer's services and has been given reasonable warning that the lawyer will withdraw
19 unless the obligation is fulfilled;
20 (6) The representation will result in an unreasonable financial burden on the lawyer or
21 has been rendered unreasonably difficult by the client; or
22 (7) Other good cause for withdrawal exists.

23 Due to the attorney-client privilege and Counsel's duties of confidentiality and loyalty,
24 Counsel cannot disclose the specific circumstances prompting the instant Motion. However, as set
forth in the Declaration of Jeffrey Gronich attached hereto as Exhibit I, multiple bases identified
in NRPC 1.16(b) exist for Counsel's withdrawal. Generally, the relationship between Counsel
and Plaintiff has broken down to the extent that Counsel can no longer effectively represent
Plaintiff's interests. Gronich Decl. ¶ 3.

25 Here, upon information and belief, no attorney has been retained by Plaintiff to represent
26 his interest, so an order of the Court granting withdrawal is necessary. Prior to this Motion, the
27 Parties have stipulated to stay the Early Neutral Evaluation until December 8, 2022 (Dkt. No.
28

1 19). The Parties have also agreed to a stay of discovery until one week before the ENE (Dkt.
2 #17). Therefore, there will be no prejudice to Plaintiff as he will either have enough time to
3 obtain new counsel or to get acquainted with his requirements to proceed pro se.

4 Furthermore, Plaintiff himself consents to the withdrawal as indicated in the attached
5 declaration at Exhibit II.

6 Counsel will serve a copy of this Motion on Plaintiff and all other parties to this action
7 upon filing.

8 Consequently, counsel respectfully requests that this Court grant its motion to withdraw as
9 counsel of record for Plaintiff in this matter.

10 **II. Conclusion**

11 Based on the foregoing, Jeffrey Gronich and Jeffrey Gronich, Attorney at Law, P.C.
12 respectfully move this Court to enter the proposed Order at Exhibit III granting his motion for leave
13 to withdraw.

14 Dated this 13th day of October, 2022.

15 Respectfully submitted,

16 By: /s/ Jeffrey Gronich
17 Jeffrey Gronich, Esq.
18 Jeffrey Gronich, Attorney at Law, P.C.
19 1810 E. Sahara Ave., Suite 109
20 Las Vegas, NV 89104
21 Tel (702) 430-6896
22 Fax (702) 727-3903

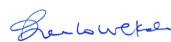
23 **ORDER**

24 IT IS ORDERED that ECF No. 21 is GRANTED.

25 IT IS FURTHER ORDERED that Jeffrey Gronich must serve a copy of this order on Plaintiff.

26 IT IS FURTHER ORDERED that the Clerk of Court is directed to update Plaintiff's address consistent
27 with ECF No. 21 at 4.

28 IT IS SO ORDERED
29 DATED: 12:18 pm, October 14, 2022

30 
31 BRENDA WEKSLER
32 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of October, 2022, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW AS COUNSEL OF RECORD** on the following person(s) by electronically filing via the CM/ECF system utilized by this Court:

SEYFARTH SHAW LLP
Giovanna A. Ferrari (Pro Hac Vice)
Caitlyn M. Crisp (Pro Hac Vice)
2029 Century Park East, Suite 3500
Los Angeles, California 90067-3021
Telephone: (310) 277-7200
Facsimile: (310) 201-5219
gferrari@seyfarth.com
ccrisp@seyfarth.com

KAMER ZUCKER ABBOTT
Kaitlin H. Paxton #13625
3000 West Charleston Blvd., Suite 3
Las Vegas, NV 89102
Telephone: (702) 259-8640
Facsimile: (702) 259-8646
kpaxton@kzalaw.com

Attorneys for Defendants

Zachary Lasko
10709 Yarmouth Bay Ct
Las Vegas, NV 89179
zacharylasko@gmail.com

Plaintiff

/s/ Jeffrey Gronich
An Employee of Jeffrey Gronich, Attorney at Law, P.C.